

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

RENEE ZINSKY,

Plaintiff,

V.

**MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS III,
ARIAS AGENCIES, S.A. HOLDINGS, LLC
and AMERICAN INCOME LIFE
INSURANCE COMPANY,**

Defendants

2:22-CV-547

Judge Marilyn J. Horan

JOINT STATUS UPDATE

FILED ON BEHALF OF:

Defendants

Michael Russin, Russin Financial,
and Russin Group

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**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

RENEE ZINSKY,)	2:22-CV-547
)	
Plaintiff,)	
)	
v.)	
)	Judge Marilyn J. Horan
MICHAEL RUSSIN, RUSSIN FINANCIAL,)	
RUSSIN GROUP, SIMON ARIAS III,)	
ARIAS AGENCIES, S.A. HOLDINGS, LLC)	
and AMERICAN INCOME LIFE)	
INSURANCE COMPANY,)	
Defendants		

JOINT STATUS UPDATE

AND NOW, comes the Defendants, Michael Russin, Russin Financial, and Russin Group, hereinafter “Russin Defendants”, by and through their attorneys, Cozza Law Group, and files the following Joint Status Update averring as follows:

1. On April 16, 2024, Russin Defendants filed a Motion to Enforce Settlement.
2. On April 24, 2024, Plaintiff filed a Response to the Motion to Enforce Settlement stating that no settlement had occurred.
3. On April 25, 2024, Defendant American Income Life Insurance Company filed a Response to the Motion to Enforce Settlement asserting objections to the proposed settlement.
4. On May 8, 2024, Russin Defendants withdrew their Motion to Enforce Settlement.
5. As it was clear that Plaintiff and Russin Defendants had not reached any mutually agreed upon settlement, Plaintiff and Russin Defendants agreed to submit their dispute to mediation once again.
6. On May 21, 2024, Plaintiff and Russin Defendants participated in a new mediation

with Mediator David White.

7. As a result of the May 21, 2024 Mediation, Plaintiff and Russin Defendants reached a mutually agreed upon settlement agreement with new terms separate and apart from any proposed settlement in the past.

8. After May 21, 2024, Plaintiff and Russin Defendants exchanged proposals for a written settlement agreement that accurately memorialized the May 21, 2024 settlement agreement.

9. On July 18, 2024, Counsel for Russin Defendants and Plaintiff participated in a brief teleconference to iron out the wording of the settlement agreement that memorialized the May 21, 2024 settlement agreement.

10. Plaintiff and Russin Defendants have agreed upon a written settlement agreement that accurately outlines the May 21, 2024 settlement agreement.

11. The Plaintiff and Russin Defendants are now in the process of executing the settlement agreement in front of a notary.

12. Upon completion of the terms of the May 21, 2024 settlement agreement, which remain confidential, the Plaintiff shall enter a dismissal with the Court.

Respectfully Submitted,

COZZA LAW GROUP

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Date: 8/13/2024


Date 8/13/2024



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